

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
AT NASHVILLE

DONNA RAE DORRIS	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 3:14-cv-1202
	)	JUDGE NIXON
ROBERTSON COUNTY, TENNESSEE	)	MAGISTRATE JUDGE GRIFFIN
	)	
Defendant.	)	

**DEFENDANT ROBERTSON COUNTY, TENNESSEE'S**  
**MOTION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL**

Defendant Robertson County, Tennessee respectfully moves this Court for an Order authorizing it to file its Motion for Summary Judgment, Memorandum of Facts and Law in Support of its Motion for Summary Judgment (with Exhibit A and other attachments thereto), and Concise Statement of Material Facts as to which it contends there is no genuine issue for trial under seal. The foregoing documents incorporate, attach, and make reference to expunged criminal records that are no longer part of the public record. Because Defendant does not want to place expunged information into the public record, Defendant, out of an abundance of caution, respectfully requests that the Court grant this Motion for Leave to File Documents Under Seal as described above.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and exact copy of the foregoing has been served by electronic filing to:

Michael P. Mills, Esq.  
Mills & Cooper  
5042 Thoroughbred Lane, Suite A  
Brentwood, TN 37027

This 2nd day of December, 2014.

/s/ Kelly M. Telfeyan

Kelly M. Telfeyan

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